

January 19, 2012

Via Electronic Submission

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

Re: CPNI Compliance Certification; EB Docket No. 06-36

Dear Ms. Dortch:

Harbor Communications, LLC. hereby submits its Customer Proprietary Network Information ("CPNI") compliance certificate and accompanying statement certifying compliance with Section 64.200 *I et seq.* of the Commission's Rules for the calendar year 2011.

If you have any questions or require additional information, please contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink that reads "Lisa Compton". The signature is written in a cursive, flowing style.

Lisa Compton
Harbor Communications, LLC.
1509 Government Street
Mobile, AL 36604
251.445.2592

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2011

Date filed: 1/17/2012

Name of company(s) covered by this certification: Harbor Communications, LLC

Form 499 Filer ID: 821524

Name of signatory: Kevin J. Polk

Title of signatory: General Manager

I, Kevin Polk, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

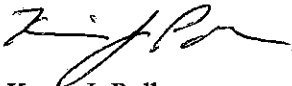
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Respectfully submitted and signed,



Kevin J. Polk
General Manager
Harbor Communications, LLC
1509 Government Street
Mobile, AL 36604

Attachment: Accompanying Statement explaining CPNI procedures

Harbor Communications, LLC
CPNI Compliance Statement

Harbor Communications, LLC ("Company") does not use, disclose or permit access to, Customer Proprietary Network Information ("CPNI") except as permitted under 47 U.S.C. § 222(d), except as otherwise required by law pursuant to 47 U.S.C. § 222(c)(I) or except as permitted under 47 U.S.C. §§ 222(c)(I)(A) and 222(c)(I)(B).

A. ~~The Company does not use, disclose, or permit access to CPNI for purposes other than in the~~ relevant provisioning of services. The company does not use, disclose or permit access to CPNI for marketing nonrelated categories of services to its customers, nor does it sell or otherwise provide CPNI for use by other companies for marketing any services to subscribers. However, if the Company were to undertake a marketing program in the future, a procedure is in place to establish the status of a customer's CPNI approval.

B. It is the policy of the Company to train its personnel as to the circumstances under which CPNI may, and may not, be used or disclosed. In addition, the Company has established an express disciplinary process in instances where its personnel do not comply with established policies. It is the Company's policy to take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. The Company requires that customers be authenticated at the beginning of all customer initiated calls. CPNI may only be disclosed to the contact of record for an account. The Company does not disclose "call detail information" (as it is defined in 47 C.F.R. § 64.2003) over the telephone. Customers requesting call detail are directed to refer to past bills or to send a written request for records. The Company does not provide online access to customer account information.

C. The Company has not conducted any marketing campaigns using CPNI. However, if it should in the future, the company is aware that all carriers must maintain a record, electronically or in some other manner, of the sales and marketing campaigns that use customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year.

D. The Company has not conducted any marketing campaigns using CPNI. However, if it should in the future, the company is aware that Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

E. In compliance with Section 64.2009(e), the Company will prepare a "compliance certificate" signed by an officer on an annual basis stating that the officer has personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with 47 C.F.R. § 64.2001 *et seq.* The certificate is to be accompanied by this statement and will be filed in EB Docket No. 06-36 annually on March 1, for data pertaining to the previous calendar year. This filing will include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.

F. If the Company undertakes a marketing campaign, the Company will provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

- a. The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and

when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

- b.** Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.

G. It is the Company's policy to notify law enforcement and customers of a breach in CPNI as required by FCC rule or by law enforcement. The Company will maintain a record, electronically or in some other manner, of any breaches discovered and notifications made to the USSS and the FBI. The record will include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. The Company will maintain the record for a minimum of 2 years.
